

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES, et al.,	)	
	)	
Plaintiffs,	)	
v.	)	No. 1:23-cv-00108-LMB-JFA
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	

**PLAINTIFFS' MOTION TO EXCLUDE EXPERT TESTIMONY OF ANTHONY  
FERRANTE**

Pursuant to Federal Rule of Civil Procedure 37, Federal Rule of Evidence 702, and related case law, the Plaintiffs, through the undersigned counsel, hereby move to exclude the proposed expert testimony of Anthony Ferrante, a purported expert offered by Defendant Google, LLC, because (1) Mr. Ferrante used no methodology at all, much less a reliable one in reaching his opinions; (2) Mr. Ferrante's opinions will not assist the trier of fact because they are irrelevant and will tend to confuse, rather than help, the jury; and (3) Mr. Ferrante relied on undisclosed "field testing" to support his opinions about header bidding and Google's Open Bidding product in violation of the Expert Stipulation and Order. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: April 26, 2024

Respectfully submitted,

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